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District of Nevada

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Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

KIMBERLY L. BUZAUSKAS

Plaintiff,

v.

CAROLYN W. COLVIN,
Acting Commissioner of Social Security,

Defendant.

)
) Case No. 2:16-cv-01901-GMN-VCF
)

) **DEFENDANT'S UNOPPOSED MOTION FOR**
) **EXTENSION OF TIME (FIRST REQUEST)**
)

1 Defendant Carolyn W. Colvin, Acting Commissioner of Social Security ("Defendant")
2 respectfully requests that the Court extend the time from October 21, 2016 to November 21, 2016 for
3 Defendant to answer the complaint and submit the certified administrative record (CAR).

4 This is Defendant's first request for an extension of time. Defendant respectfully submits that
5 the requested extension is needed to allow the Commissioner to prepare the CAR for submission to
6 this Court and parties in this action. The CAR in this case is particularly large and has taken longer
7 than anticipated to prepare for filing despite the Commissioner's diligent efforts to have it ready in
8 time. This request is made in good faith with no intention to unduly delay the proceedings.

9 Counsel for Defendant conferred via email with Plaintiff's counsel, who indicated on October
10 21, 2016 that Plaintiff does not oppose this motion or the requested extension.

11 Respectfully submitted,

12 Dated: October 21, 2016

13 DANIEL G. BOGDEN
United States Attorney

14 By: /s/ Sundeep Patel
15 SUNDEEP PATEL
Special Assistant United States Attorney
Attorneys for Defendant

16 OF COUNSEL TO DEFENDANT:

17 DEBORAH LEE STACHEL
Regional Chief Counsel, Region IX

18 MARGARET BRANICK-ABILLA
19 Assistant Regional Counsel

20
21 IT IS SO ORDERED:

22 
23 _____
24 HON. CAM FERENBACH
UNITED STATES MAGISTRATE JUDGE

25 10-21-2016
26 DATED: _____

CERTIFICATE OF SERVICE

I, Sundeep Patel, certify that the following individual(s) was served with a copy of the **DEFENDANT'S UNOPPOSED MOTION FOR EXTENSION OF TIME (FIRST REQUEST)** on the date and via the method of service identified below:

CM/ECF:

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Date: October 21, 2016

/s/ Sundeep Patel
SUNDEEP PATEL
Special Assistant United States Attorney